

**To:** Lorang, Phil[Lorang.Phil@epa.gov]  
**Cc:** Werner, Christopher[Werner.Christopher@epa.gov]; Keas, Ashley[keas.ashley@epa.gov]  
**From:** Beaver, Melinda  
**Sent:** Wed 7/19/2017 6:19:54 PM  
**Subject:** RE: Ark Reg Haze SIP

Thanks Phil. Thoughts and further questions in red below, then a draft email to Anna is further below.

**From:** Lorang, Phil  
**Sent:** Monday, July 17, 2017 3:19 PM  
**To:** Beaver, Melinda <Beaver.Melinda@epa.gov>  
**Cc:** Werner, Christopher <Werner.Christopher@epa.gov>; Keas, Ashley <keas.ashley@epa.gov>  
**Subject:** RE: Ark Reg Haze SIP

## Ex. 5 - Deliberative Process

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I emailed Dayana asking about their schedule, but haven't heard anything back yet. According to Lea, we might have a draft to review next week. I'm going to wait one more day to hear back from R6, then I'll plan to send something like the below to Anna (via Vera and Rhea). Let me know if you have suggestions?

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Hi Anna,

I've looked through the Arkansas SIP revision. Below are a few notes about what it does and then a few reactions. Region 6 expects to send a draft NPRM our way for a quick review sometime during the weeks of July 24 or July 31.

Summary of AR's SIP Revision:

- The SIP only deals with NO<sub>x</sub>, since those compliance deadlines are the closest.
- The SIP replaces EGU BART NO<sub>x</sub> emission limits with reliance on CSAPR for BART.
- The SIP replaces the FIP's RP NO<sub>x</sub> emission limits (consistent with low-NO<sub>x</sub> burners) on 2 units at Independence power plant with reliance on CSAPR.

Analysis of SIP Revision:

## Ex. 5 - Deliberative Process

**From:** Beaver, Melinda  
**Sent:** Monday, July 17, 2017 9:53 AM  
**To:** Lorang, Phil <[Lorang.Phil@epa.gov](mailto:Lorang.Phil@epa.gov)>  
**Cc:** Werner, Christopher <[Werner.Christopher@epa.gov](mailto:Werner.Christopher@epa.gov)>; Keas, Ashley <[keas.ashley@epa.gov](mailto:keas.ashley@epa.gov)>  
**Subject:** RE: Ark Reg Haze SIP

Hi Phil,

I've skimmed through the AR NOx SIP revision and have a question.

First, a summary:

- The SIP relies on CSAPR for NOx BART.
- For RP, the SIP concludes that EGUs participating in CSAPR for ozone-season NOx meets the RP obligations, and removes the FIP's emission limit on Independence's units.

- o This conclusion is reached after describing that Arkansas' NOx emissions are not an important contributor to visibility impairment at Arkansas Class I areas. No 4 factor analysis of any sources.
- o The state also mentions that the 2018 CSAPR allocations are lower than the 2016 CSAPR allocations, by slightly more tons/year than the Independence controls would've reduced NOx emissions. Also, the state expects some EGUs to install combustion controls to comply with CSAPR.

My thoughts:

## Ex. 5 - Deliberative Process

Thoughts?

Melinda

**From:** Wood, Anna

**Sent:** Thursday, July 13, 2017 4:57 PM

**To:** Beaver, Melinda <[Beaver.Melinda@epa.gov](mailto:Beaver.Melinda@epa.gov)>; Lorang, Phil <[Lorang.Phil@epa.gov](mailto:Lorang.Phil@epa.gov)>; Kornylak, Vera S. <[Kornylak.Vera@epa.gov](mailto:Kornylak.Vera@epa.gov)>; Jones, Rhea <[Jones.Rhea@epa.gov](mailto:Jones.Rhea@epa.gov)>

**Subject:** Re: Ark Reg Haze SIP

Also please let me know if you see any issues with what AR is seeking approval for in their SIP, thx!

Sent from my iPhone

On Jul 13, 2017, at 4:18 PM, Wood, Anna <[Wood.Ann@epa.gov](mailto:Wood.Ann@epa.gov)> wrote:

Pls see note below from Wren. R 6 is asking for a quick turnaround time for our review of this action.

Melinda, please let me know what you think and you may want to reach out to your counterpart in R 6 to get a sense of what the R thinks it will need from us and timing. Please let me know if you need anything from me, thank you!

Sent from my iPhone

Begin forwarded message:

**From:** "Stenger, Wren" <[stenger.wren@epa.gov](mailto:stenger.wren@epa.gov)>  
**Date:** July 13, 2017 at 3:45:30 PM EDT  
**To:** "Koerber, Mike" <[Koerber.Mike@epa.gov](mailto:Koerber.Mike@epa.gov)>, "Wood, Anna" <[Wood.Ann@epa.gov](mailto:Wood.Ann@epa.gov)>  
**Subject:** Ark Reg Haze SIP

ADEQ proposed its RH SIP for NOx yesterday and announced its comment period. They sent it to us yesterday and have requested that we parallel process the SIP.

## Ex. 5 - Deliberative Process

Wren Stenger

Director, Multimedia Division

Region 6 EPA

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